

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

**BILL OF INFORMATION FOR
WIRE FRAUD**

UNITED STATES OF AMERICA	*	CRIMINAL NO.
v.	*	SECTION:
LEANDRA THORNTON	*	VIOLATION: 18 U.S.C. §1343
	*	*
	*	*

The United States Attorney charges that:

COUNT 1

A. AT ALL TIMES MATERIAL HEREIN:

1. On or about August 29, 2005, Hurricane Katrina struck southeastern Louisiana and shortly thereafter a major disaster was declared. Similarly, a major disaster was declared in Louisiana as a result of Hurricane Rita, which made landfall on September 24, 2005. In response to these hurricanes and the damage inflicted upon the Southeastern Louisiana area, the American Red Cross (“Red Cross”) established assistance centers throughout the region in the late summer and early fall of 2005.

2. At these assistance centers, people affected by the storms were able to apply for a one-time only financial grant of up to \$1,565 from the Red Cross. In order to receive these funds, applicants needed to present identification to a Red Cross representative that indicated residence in an affected zone. Applicants were also asked if they had previously received financial assistance from the Red Cross and were required to attest and sign a statement that certified that the applicant had not received any other financial assistance from the Red Cross from any other assistance center.

3. Once approved, the Red Cross made these disaster assistance funds available in one of four ways: (1) A personal check made payable to the applicant, issued on-site, and cashed with the assistance of the Red Cross; (2) A Red Cross-issued “Discover” card, issued on-site, and activated via phone by the applicant; (3) A Red Cross-issued “Client Assistance Card” (“CAC”) card, issued on-site and activated via phone by the applicant; (4) A personal check authorized by the Red Cross and mailed through the United States Postal Service to an address provided by the applicant.

4. The Red Cross purchased approximately 200,000 “gift cards” from Discover, a credit card company. These gift cards were “loaded” with a specific amount of money, depending upon the applicant’s qualifications. The cards were activated by the applicant’s calling an activation hotline and were thereafter usable in a manner otherwise consistent with a debit/credit card. in a manner otherwise consistent with a debit/credit card.

5. The defendant, **LEANDRA THORNTON (“THORNTON”)**, presented herself to Red Cross assistance centers on eleven (11) occasions: on or about September 9, 2005; on or about September 12, 2005; on or about September 15, 2005; and, on or about September 16, 2005; on or about September 26, 2005; on or about September 27, 2005; on or about October 1, 2005; on or about October 3, 2005; and on or about October 5, 2005. On each visit, she applied for financial

assistance and indicated that she had not received any other financial assistance from the Red Cross. As a result of her actions on these eleven applications, the defendant, **LEANDRA THORNTON**, received direct financial assistance from the Red Cross in one of the four manners described above, totaling \$15,685.00, of which \$14,085.00 was fraudulently obtained.

B. THE SCHEME TO DEFRAUD:

Beginning on or about September 9, 2005 and continuing through on or about October, 5, 2005, in the Eastern District of Louisiana and elsewhere, the defendant, **LEANDRA THORNTON**, did knowingly and willfully devise and intend to devise a scheme and artifice to defraud the Red Cross by means of false representations, pretenses, and promises, and for the purpose of obtaining money and property, by attesting to the Red Cross that she had not received any other financial assistance from the Red Cross at any other Red Cross assistance center, when she knew well that she had previously received the maximum Red Cross assistance for which she was eligible on September 9, 2005, and knowing that the Red Cross provided said assistance on a one time only basis.

C. THE USE OF THE WIRE:

On or about October 2, 2005, in the Eastern District of Louisiana and elsewhere, the defendant, **LEANDRA THORNTON**, for the purpose of executing and attempting to execute the scheme and artifice to defraud as described in Part B, did knowingly and willfully cause to be transmitted in interstate commerce certain writings, signs, signals, and sounds by means of wire communications when the defendant, **LEANDRA THORNTON**, used a Red Cross-issued Discover debit/credit card numbered XXXX XXXX XXXX 3034 to obtain property, goods, services, and money in the Eastern District of Louisiana, specifically at a Circuit City store located in Slidell, Louisiana, which caused a signal, sign, writing, and sound to be transmitted to the authorization

server in Dallas, Texas, approving the transaction, resulting in the transmittal of an electronic authorization from Dallas, Texas, back to the Circuit City store in Slidell, Louisiana, allowing the defendant, **LEANDRA THORNTON**, to receive the property, goods, services, and money by the use of the falsely and fraudulently obtained Discover debit/credit card issued to the defendant, **LEANDRA THORNTON**; all in violation of Title 18, United States Code, Section 1343.

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